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Special Litigation Counsel for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a
Washington corporation,
Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit
Chapter 7

**DECLARATION OF PAMELA M. EGAN
IN SUPPORT OF POTOMAC LAW
GROUP'S REPLY TO JUN DAM'S
OBJECTION TO THE FIRST AND FINAL
CONTINGENCY FEE APPLICATION OF
THE POTOMAC LAW GROUP PLLC
(PERKINS ADVERSARY PROCEEDING)**

Hearing Date:

Date: September 10, 2024

Time: 10:30 Pacific Time

Location: 904 West Riverside Ave., Ste. 304
Spokane, WA 99201

I Pamela M. Egan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.

2. I am a partner in the Potomac Law Group PLLC. I submit this declaration in support of the *Potomac Law Group's Reply to Jun Dam's Objection*

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1 to the First and Final Contingency Fee Application of the Potomac Law Group
2 PLLC (Perkins Adversary Proceeding (“Reply”). Unless otherwise defined herein,
3 capitalized terms have the meanings ascribed to them in the Reply.

4 3. The statements made herein are based on my personal knowledge. If
5 called, I could and would testify to the facts stated herein.

6 4. A true and correct copy of the WTT Token Settlement Agreement is
7 attached to the Reply as Exhibit A.

8 5. A true and correct copy of *Order Granting Final Approval of Class*
9 *Action Settlement*, dated May 23, 2024 is attached to the Reply as Exhibit B.

10 6. A true and correct copy of the Mr. Dam and the Trustee’s *Stipulated*
11 *Dismissal of Consolidated Appeals*, with the file stamp, is attached to the Reply as
12 Exhibit C.

13 7. A true and correct copy of the District Court’s *Order Granting*
14 *Dismissal and Closing File*, relating to Mr. Dam’s appeal of the Automatic Stay
15 Order is attached to the Reply as Exhibit D.

16 8. A true and correct copy of the Settlement Agreement and Release,
17 between the Trustee and Perkins is attached hereto as Exhibit E.

18 9. I informed the lawyers for Perkins, Mr. Dam and the WTT settlement
19 class that the Trustee would not settle without: (1) a release of the estate by Mr.
20 Dam and class members; (2) limited relief from the stay before Mr. Dam and the
21 WTT Token settlement class could seek approval of their settlement with Perkins;

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1 and (3) the dismissal of Mr. Dam's appeal of the Automatic Stay Order with
2 prejudice.

3 10. Negotiations of the global settlement between Mr. Dam, the putative
4 settlement class, the Trustee and Perkins regarding the Perkins Adversary and the
5 WTT Token Class Action took more than a year.

6 11. The settlements of the WTT Token Class Action and the Perkins
7 Adversary became effective on July 8, 2024 after the Orders approving both
8 settlements became final and nonappealable, Mr. Dam dismissed his appeal of the
9 Automatic Stay Order, and all the other conditions to the settlement were met.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on this 27th day of August 2024 in Seattle, Washington.

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13 /s/ Pamela M. Egan

14 Pamela M. Egan
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[TO BE REMOVED BEFORE FILING]

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